

October 14, 2002

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Dear Ms. Dortch:

Montana Wireless, Inc. ("MWI") hereby submits its quarterly report on the implementation of Text Telephone ("TTY") access to E911 over its digital wireless network, pursuant to the Commission's *Fourth Report and Order* in CC Docket No. 94-102, released December 14, 2000.

MWI is committed to complying with Commission requirements regarding TTY. However in order to comply with this government mandate, MWI must upgrade its system. As the Commission is aware from MWI's previous filings in this docket, due to Nortel's discontinuation of its support of MWI's current dual-load wireless and wireline traffic switch, MWI must purchase a second switch and split the traffic from the existing switch. Before MWI can split the traffic, it must upgrade the system software to LWW007 (the equivalent of wireless MTX 9). Once the switch split is achieved, MWI must upgrade the system software a second time to wireless load MTX 10. Because of Nortel's decision to no longer support its dual mode switch, MWI has been put in the unusual circumstance of having to perform a technically complex switch split seamlessly.

Before MWI can proceed with the complex implementation task ahead of it, however, it must obtain the necessary software and hardware from its longtime vendor, Nortel. Attached hereto is a copy of a letter dated October 4, 2002, from Nortel's Senior Sales Executive, Brian Meehan, to MWI parent company Blackfoot Telephone Cooperative's Dave Martin. Mr. Meehan's letter provides a status on the remaining proposal, which Nortel hopes to provide by October 11, 2002.

Not only must MWI upgrade its software in preparation for the installation of the second switch. MWI must also determine if it will require any modifications to its physical plant to accommodate the additional hardware such as additional power or cooling capability. Once the new switch is installed, MWI must install a second software upgrade that will permit it to split the traffic from the single switch, and accomplish that split. MWI understands that it will take about ten weeks to complete each software upgrade and approximately four months for the switch split. When the second upgrade is complete, MWI will be in a position to test and deploy the new technology.

MWI submits that it has no reasonable alternative than to wait for Nortel to provide it with a quote for the switch splitting and software upgrades. MWI's system is completely based on Nortel infrastructure; any alternative solution would require a complete replacement of MWI's entire system. Such an action would be financially prohibitive and economically wasteful. MWI chose the dual switch to serve its rural market because it was more economical than a two-switch system. As a rural operator, MWI's license area is sparsely populated; it does not receive a return on its infrastructure development investment as rapidly as non-rural operators. Therefore, when constructing its system MWI chose a dual load switch, the most economical alternative. At the time MWI purchased the switch, it did not envision that Nortel would discontinue its support of the technology a few short years later.

MWI remains committed to complying with Commission requirements regarding TTY.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Bill Squires", with a stylized flourish at the end.

Bill Squires
Senior Vice President – General Counsel
Montana Wireless, Inc.

Montana Wireless, Inc.
E911 TTY Device Capability Report as of October 14, 2002

Development Activities

1. **Network Infrastructure Software Development** – We have continued discussions with our network vendor, Nortel. They indicate that TTY compatible software will be in the MTX 10 software load. This software load cannot be installed until the current switch is split and a new switch installed.
2. **Handset Development and Testing Plans** – We currently offer our customers two different models of Motorola TTY capable handsets. In addition, we will be evaluating a new Nokia handset, model 6385, which is due to be released at the end of October. It is reportedly TTY compatible and we expect to offer it for sale as well. By November 1 we anticipate bringing in a Kyocera 2300 handset, which is also TTY capable. However, the TTY feature will not become functional until our system upgrade is completed. To date, we have not had a single request for TTY capable equipment.
3. **Beta Testing and Lab Testing** – We are a small rural carrier, and are looking to our equipment manufacturers to conduct full beta and lab testing of network software, handsets and infrastructure equipment. However, we will test the equipment we procure as soon as it is available, to make sure it meets the manufacturer's specifications.
4. **Release and General Availability to Carriers of Network Infrastructure Software** – Unable to determine a firm date at this time with any manufacturer or vendor.
5. **Availability to Carriers of Full Digital Acceptance Test Units** – Unable to determine a firm date at this time with any manufacturer or vendor.
6. **Efforts Toward Achieving Digital Wireless Solution compatibility with enhanced TTY** – We must upgrade our switch, split the switch and load additional software. We have requested a quote from Nortel on a weekly basis since late 2001, but Nortel has not yet agreed to a schedule to provide the required equipment and software to upgrade our system.

Testing and Deployment Activities

7. **Carrier Coordination of Testing with PSAP** – We will test with the PSAPs in the areas where this service will be deployed. Any coordination with the PSAP will be done on a case-by-case basis, in cooperation with the relevant PSAP personnel.
8. **Carrier Testing Activities, Including Field Testing, Consumer and End-to-End Testing, and Other Necessary Tests** – Each of these will be

tested once equipment, software availability, deployment, installation, and turn up are completed.

9. **Retail Availability of Necessary Consumer Equipment** - We are unable to determine the retail availability of consumer equipment, as none of the handset manufacturers has been able to release a date for general availability. However, as indicated above, at least two major manufacturers have indicated that they are moving toward handset availability during the second half of 2002.
10. **Geographic Scope of Network Infrastructure Development** – Since our network has only one switch, as hardware becomes available, it will be deployed across our whole network. Likewise, as TTY compliant handsets become available we will offer them in all retail locations.



October 4, 2002

Mr. Dave Martin
Blackfoot Telephone Cooperative
1221 North Russell St
Missoula, MT 59808

Dear Mr. Martin

Nortel Networks is applying the finishing touches to Blackfoot Telephone's MTX proposal. This proposal will provide Blackfoot Telephone with a choice between a new MTX switch and a new DMS-100 per the previously delivered proposal. When Blackfoot has both proposals in house (we are aiming for October 11) a decision can be made as to which platform the second switch will be. Then Blackfoot Telephone will be able to comply with regulatory requirements such as CALEA, E-911 Phase II, E-911 TTY, TDD and LNP Phase II. As you are aware, the DMS-100W which provides both wire line and wire less services was manufacture discontinued in 2001.

Please keep in mind that once a decision is made, we are looking at approximately nine months of work prior to in service.

We apologize for the lengthy delay in assisting Blackfoot Telephone and your quest to be compliant with regulatory features.

Sincerely

Brian Meehan
Senior Sales Executive
Nortel Networks